

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

KENNETH E. BOBIN,
Defendant

)
) Case No. 04-1836-CBS
)
)
)
)

**JOINT MOTION TO FURTHER ENLARGE THE TIME FOR THE FILING OF AN
INFORMATION OR INDICTMENT**

The United States of America, by Michael J. Sullivan, U.S. Attorney, and David Hennessy, Assistant U.S. Attorney, and Defendant, by his counsel Timothy G. Watkins, Esq., jointly move the Court for an Order that enlarges the time for the filing of an Information or Indictment from January 13, 2005, until January 26, 2005, pursuant to 18 U.S.C. §§ 3161(b) and 3161(h)(8)(A), as the ends of justice in taking such action outweigh the best interest of the public and defendant in a speedy trial. This is the first enlargement sought by the parties. In support of this motion, the parties state that additional time is required to pursue a possible resolution of the charge, pursuant to Fed. R. Crim. P. 11, without indictment.

Agreed:

KENNETH BOBIN
Defendant

Respectfully submitted,

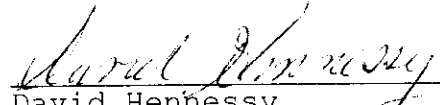
By: Timothy G. Watkins, Esq. MICHAEL J. SULLIVAN
Timothy G. Watkins, Esq. UNITED STATES ATTORNEY

By: David Hennessy
David Hennessy
Assistant U.S. Attorney

ss., Worcester

CERTIFICATE OF SERVICE

I, David Hennessy, Assistant U.S. Attorney, hereby certify that a copy of the foregoing was served by fax/mail upon Timothy G. Watkins, Esq., on this the 22nd of December, 2004.



David Hennessy
Assistant U.S. Attorney